

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

HECTOR HERNANDEZ ESTREMER §  
MARISOL LEAL LOPEZ, AND §  
KATHLEEN AUDIFFRED §

VS. §

CIVIL NO. 5:20-cv-01106

§  
MICHAEL LYNN BRIGHT, Individually §  
And d/b/a MLB TRUCKING OF IDAHO §  
And SHANNON RANEE CAROTHERS, §  
Individually and d/b/a §  
CAROTHERS TRUCKING §

**DEFENDANT, SHANNON RANEE CAROTHERS, Individually and d/b/a CAROTHERS  
TRUCKING'S NOTICE OF REMOVAL**

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE  
SOTHERN DISTRICT OF TEXAS:

Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendant, Shannon Ranee Carothers, Individually and d/b/a Carothers Trucking hereby removes this action to the United States District Court for the Western District of Texas San Antonio Division from the 224<sup>TH</sup> Judicial District Court of Bexar County, Texas, stating as follows:

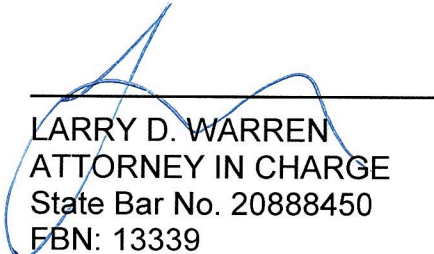
1. Plaintiffs, Hector Hernandez Estremera, Marisol Leal Lopez and Kathleen Audiffred commenced this action in the 224<sup>th</sup> Judicial District Court of Bexar County, Texas, where it was given Cause No. 2020CI14473. This action is between citizens of different states. Plaintiffs are residents of Texas. Defendant, Shannon Ranee Carothers and d/b/a Carothers Trucking is a Idaho corporation with a principal place of business in Shoshone, Idaho. Defendant, Michael Lynn Bright and d/b/a MLB Trucking of Idaho is an Idaho corporation with a principal place of business in Shoshone, Idaho. Plaintiff and Defendants are citizens of different states, none of the Defendants are citizens of Texas, and the proper parties are totally diverse from Plaintiffs.

2. Defendant, Shannon Ranee Carothers and d/b/a Carothers Trucking received the summons and complaint on August 21, 2020, by way of its registered Agent.

3. Defendant, Michael Lynn Bright and d/b/a MLB Trucking of Idaho has not been served.
4. A copy of all process, pleadings, and orders served upon Defendant are attached as Exhibit A.
5. Defendant will provide written notice of this Notice of Removal to all adverse parties and will file a copy with the Clerk of the 244<sup>th</sup> Judicial District Court of Bexar County, Texas.
5. Defendants consent to this removal.

Dated: **September 17**, 2020

Respectfully submitted,

  
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LARRY D. WARREN  
ATTORNEY IN CHARGE  
State Bar No. 20888450  
FBN: 13339  
**ATTORNEY FOR DEFENDANTS  
SHANNON RANEE CAROTHERS,  
Individually and d/b/a CAROTHERS  
TRUCKING**

OF COUNSEL:

NAMAN HOWELL SMITH & LEE, PLLC  
10001 Reunion Place, Suite 600  
San Antonio, Texas 78216  
Telephone: (210) 731-6350  
Facsimile: (210) 785-2950  
[lwarren@namanhowell.com](mailto:lwarren@namanhowell.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17 day of **September 2020**, the foregoing document, was filed with the Clerk of Court using the CM/ECF system, and was served on counsel

via **E-mail**:

Joe A. Gamez  
State Bar No. 07607200  
Jose L. Rios, Jr.  
State Bar No. 24098326  
JOE A. GAMEZ LAW FIRM, P.C.  
1119 Fresno Road  
San Antonio, Texas 78201  
Telephone: (210) 736-4040  
Facsimile: (210) 734-0100  
E-service: [JRios@jagamezlaw.com](mailto:JRios@jagamezlaw.com)  
**ATTORNEYS FOR PLAINTIFFS**



LARRY D. WARREN